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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
INTERNET TRANSACTION  
SERVICES, INC., et al.,  
Defendants.

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Civil Case No. 21-6582-JFW (KSx)

**STIPULATED ORDER FOR  
PERMANENT INJUNCTION AND  
FINAL JUDGMENT AS TO  
DEFENDANT JENNY SULLIVAN**

1 On August 13, 2021, the United States of America filed its Complaint for  
2 Temporary Restraining Order, Preliminary and Permanent Injunctions, and Other  
3 Equitable Relief (the “Complaint”) against Defendant Jenny Sullivan  
4 (“Defendant”) and other named Defendants, pursuant to 18 U.S.C. § 1345, based  
5 on Defendants’ alleged violations of 18 U.S.C. §§ 1343, 1344, and 1349. On  
6 August 20, 2021, the Court issued its Order granting the United States’ Ex Parte  
7 Application for a Temporary Restraining Order. On September 2, 2021, the Court  
8 issued a Preliminary Injunction.

9 The United States and Defendant stipulated to the entry of this Stipulated  
10 Order for Permanent Injunction (“Order”). Defendant, *pro se*, entered into the  
11 Stipulation freely and without coercion. Defendant further acknowledged that she  
12 has read the provisions of the Stipulation and this Order, understands them, and is  
13 prepared to abide by them. Per the parties’ agreement, the Stipulation and this  
14 Order resolve only the claims against Defendant in the above-captioned civil  
15 lawsuit. They do not prevent the United States from pursuing criminal penalties  
16 against Defendant in relation to the conduct alleged in the Complaint, nor does  
17 Defendant’s Stipulation constitute evidence that Defendant committed the acts  
18 alleged in the Complaint, or in any way prejudice Defendant’s ability to contest the  
19 allegations in the Complaint in a future proceeding.

20 Accordingly, it is hereby ORDERED, ADJUDGED, AND DECREED that:

21 **FINDINGS**

22 A. This Court has jurisdiction over the subject matter of this case and  
23 there is good cause to believe that it will have jurisdiction over all parties hereto  
24 and that venue in this district is proper.

25 B. The United States seeks injunctive relief pursuant to 18 U.S.C. §  
26 1345.

1 C. Defendant neither admits nor denies any of the allegations in the  
2 Complaint. Only for purposes of this action, Ms. Sullivan admits the facts  
3 necessary to establish jurisdiction.

#### 4 **DEFINITIONS**

5 For the purpose of this Order:

6 A. "Asset" means any legal or equitable interest in, right to, or claim to,  
7 any property, wherever located and by whomever held.

8 B. "Corporate Entities" means Defendants Internet Transaction  
9 Services, Inc., Intertrans.com, Inc., and each of the "Shell Entities" defined below.

10 C. "Payment Processing Services" means handling credit card  
11 transactions, debit card transactions, Automated Clearing House (ACH)  
12 transactions, check transactions, money orders, or cash transactions.

13 D. "Person" means any individual, corporation, a partnership, or any  
14 other entity.

15 E. "Receiver" means Thomas W. McNamara, and any deputy receivers  
16 that shall be named by him.

17 F. "Receivership Entities" means Defendants Internet Transaction  
18 Services, Inc.; Intertrans.com, Inc.; as well as any other entity that has conducted  
19 any business related to Intertrans' participation in the scheme that is the subject of  
20 the Complaint in this matter, including receipt of Assets derived from any activity  
21 that is the subject of the Complaint in this matter, and that the Receiver  
22 determines is controlled or owned by Intertrans.

23 G. "Shell Entities" means Defendants Be a Kloud LLC; Blue Water  
24 LLC; CBX International Inc. (Delaware); CBX International, Inc. (Florida); Delta  
25 Cloud LLC; Dollar Web Sales LLC; ECloud Secure LLC; Eastgate View LLC; I-  
26 Support Group LLC; My Kloud Box LLC; Newagecloudservices LLC; NRG  
27 Support LLC; Silver Safe Box LLC; Silver Safe Box Inc.; Storage VPN LLC; and  
28 VPN Me Now LLC.

1 **ORDER**

2 **I. PROHIBITED ACTIVITIES**

3 IT IS ORDERED that Defendant, her agents and attorneys, and all other  
4 persons in active concert or participation with her, who receive actual notice of this  
5 Order by personal service or otherwise, are permanently restrained and enjoined  
6 from:

7 A. Committing or conspiring to commit wire fraud, as defined by 18  
8 U.S.C. §§ 1343 and 1349;

9 B. Committing or conspiring to commit bank fraud, as defined by 18  
10 U.S.C. §§ 1344 and 1349;

11 C. Charging or debiting any person or entity on behalf of any Shell  
12 Entities or for the purported purchase of any Shell Entities' services;

13 D. Debiting funds from consumers' bank accounts without their prior  
14 authorization;

15 E. Engaging in any tactics to avoid fraud and risk monitoring programs  
16 established by any financial institution, payment processors, or the operators of any  
17 payment system, including by using sham transactions, such as the "micro  
18 transactions" described in the Complaint, to reduce a bank account's return or  
19 chargeback rate, or by using shell corporations to open bank accounts;

20 F. Incorporating or creating any corporate entity for the purpose of  
21 debiting funds from consumers' bank accounts without their prior authorization;

22 G. Selling, renting, leasing, transferring, or otherwise disclosing, the  
23 name, address, birth date, telephone number, email address, credit card number,  
24 bank account number, Social Security number, IP address, or other financial or  
25 identifying information of any person that any Defendant obtained in connection  
26 with any activity that pertains to the subject matter of this Order; and

27 H. Providing any support or substantial assistance to any Person that  
28 Defendant knows is engaged in any of the above activities.

1 **II. COOPERATION WITH RECEIVER AND ASSET FREEZE**

2 For any Corporate Entities' or Receivership Entities' Assets within the  
3 control of Defendant, her agents and attorneys, and/or all other persons in active  
4 concert or participation with her, Defendant shall:

5 A. Hold, preserve, and retain within her control and prohibit the  
6 withdrawal, removal, alteration, assignment, transfer, pledge, encumbrance,  
7 disbursement, dissipation, relinquishment, conversion, sale, or other disposal of  
8 any Asset, as well as all Documents or other property related to such Assets,  
9 except by further order of this Court or by direction of the Receiver;

10 B. Fully cooperate with and assist the Receiver in taking and maintaining  
11 possession, custody, or control of the Receivership Entities' Assets; and

12 C. To the extent she has not done so already, provide the United States,  
13 within seven (7) days after entry of this Order or of obtaining direct or indirect  
14 control over the Assets: (1) a list of all accounts, including savings, checking,  
15 investment, and merchant accounts held in the name of a Corporate Entity or  
16 Receivership Entity, for which the Defendant is an accountholder, signatory,  
17 beneficiary, or over which the Defendant otherwise has control; (2) a list of any  
18 other Assets held or controlled by the Defendant in the name of a Corporate Entity  
19 or Receivership Entity; and (3) the balance of each such account, or a description  
20 of the nature and value of each such Asset.

21 **III. COMPLIANCE MONITORING**

22 For a period of five (5) years after the date of entry of this Order, Defendant  
23 must notify the United States if she:

24 A. Creates, operates, is employed by, or otherwise becomes involved in  
25 any business or entity that provides, or consults or provides advice regarding  
26 Payment Processing Services;

27 B. Creates, operates, is employed by, or otherwise becomes involved in  
28 any business or entity that monitors return or chargeback rates for any other

1 business or corporate entity; and/or provides advice or consulting on how to lower  
2 or manage return or chargeback rates for any business or corporate entity;

3 C. Creates, operates, is employed by, or otherwise becomes involved in  
4 any business or entity that purports to offer cloud computing services, identity theft  
5 protection services, or technology support services; and/or

6 D. Creates, operates, or exercises control over any business entity,  
7 whether newly formed or previously inactive. Defendant must also provide the  
8 United States with a written statement disclosing: (1) the name of the business  
9 entity; (2) the address and telephone number of the business entity; (3) the names  
10 of the business entity's officers, directors, principals, managers, and employees;  
11 and (4) a detailed description of the business entity's intended activities.

12 **IV. ORDER ACKNOWLEDGMENTS**

13 It is further ordered that within fifteen (15) days after entry of this Order, the  
14 Defendant is ordered to submit to Postal Inspector Ashlea Bowens a written  
15 acknowledgement of receipt of this Order sworn under penalty of perjury. The  
16 statement shall be addressed to:

17 Postal Inspector Ashlea Bowens  
18 U.S. Postal Inspection Service  
19 P.O. Box 7404  
20 Washington, DC 20044-7404

21 **V. MODIFICATION OF ORDER**

22 This Order shall not be modified except in writing by the United States and  
23 Defendant and approved by the Court.

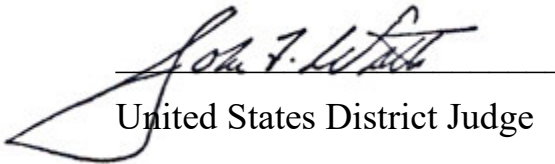
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1 **IV. RETENTION OF JURISDICTION**

2 IT IS FURTHER ORDERED that this Court shall retain jurisdiction of this  
3 matter for all purposes.

4 SO ORDERED

5  
6 DATED this 15<sup>th</sup> day of October, 2021

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8   
9 United States District Judge